

**FILED**

JAN 3 - 2022

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTY

United States of America

vs.  
State of Texas, et al.

Case No.: 5:21CV844 (lead case)

**MOTION FOR ADMISSION PRO HAC VICE**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Mark F. (Thor) Hearne, II, applicant herein, and  
moves this Court to grant admission to the United States District Court for the Western District of  
Texas pro hac vice to represent Amicus John R. Ashcroft, Mo Sec'y of State in this case, and  
would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm (or practices under the name of)  
True North Law, LLC with offices at:  
Mailing address: 112 S. Hanley Road, Suite 200  
City, State, Zip Code: St. Louis, MO 63105  
Telephone: (314) 296-4000 Facsimile: (314) 296-4001
2. Since April 29, 1988, Applicant has been and presently is a  
member of and in good standing with the Bar of the State of Missouri.  
Applicant's bar license number is 37707.
3. Applicant has been admitted to practice before the following courts:

Court:	Admission date:
<u>Supreme Court of Michigan</u>	<u>March 20, 1987</u>
<u>DC Court of Appeals</u>	<u>May 10, 2013</u>
<u>U.S. Supreme Court</u>	<u>May 28, 1996</u>

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):  
n/a

5. I ☐ have ☒ have not previously applied to Appear Pro Hac Vice in this district court in Case[s]:

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Number: \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided:  
n/a

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):  
n/a

8. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: \_\_\_\_\_

Mailing address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 pro hac vice fee in compliance with Local Court Rule AT-1(f)(2) [checks made payable to: Clerk, U.S. District Court].

Wherefore, Applicant prays that this Court enter an order permitting the admission of Mark F. (Thor) Hearne, II to the Western District of Texas pro hac vice for this case only.

Respectfully submitted,

Mark F. (Thor) Hearne, II

[printed name of Applicant]

[signature of Applicant]

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 21st day of December, 2021.

Mark F. (Thor) Hearne, II

[printed name of Applicant]

[signature of Applicant]